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February 17, 2021

VIA ECF

Hon. Robert W. Lehrburger
500 Pearl Street, Room 1960
United States Courthouse
New York, New York 10007

Re: First Request
D.S. and M.S. individually and on behalf of J.S. –v.- New York City
Department of Education 21-CV-00824 (JMF) (RWL)

Dear Judge Lehrburger:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request an extension of the parties' time to submit a joint letter in lieu of a court conference pursuant to the order of the Honorable Jesse M. Furman, dated February 1, 2021. I request the time to file be extended 30 days, from February 22, 2021 to March 24, 2021. This is the first request for an extension of the deadline. Plaintiff consents to the request. I was recently assigned this case and am awaiting Plaintiff's updated billing records so that I may review them and request settlement authority from the Comptroller of the City of New York, as required pursuant to New York City Charter §93(i). Accordingly, Defendant respectfully requests the time to submit a joint letter be extended to March 24, 2021.

Thank you for considering this request.

Respectfully submitted,

/s/

William G. Rives
Assistant Corporation Counsel

cc: Adam Dayan, Esquire
(Via ECF)

SO ORDERED:

2/17/2021

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE